

**Before the  
FEDERAL COMMUNICATIONS COMMISSION  
WASHINGTON, DC 20554**

In the Matter of	)	
	)	
International Bureau Seeks Comment on	)	
Recommendations Approved by World	)	IB Docket No. 16-185
Radiocommunication Conference Advisory	)	
Committee	)	

**COMMENTS OF SPRINT**

Sprint Corporation (“Sprint”) hereby respectfully submits its consolidated comments filed in response to the Federal Communications Commission (“Commission”) International Bureau’s Public Notice (“Notice”) in the above-captioned proceeding that seeks comment on the draft recommendations provided by the WRC-19 Advisory Committee (“WAC”) and the differing views expressed by the WAC in document WAC/055.<sup>1</sup>

Sprint appreciates the work completed to date by the WAC to approve and provide for the Commission’s consideration draft recommendations that will be considered by the 2019 World Radiocommunication Conference (WRC-19). Sprint provides the following comments to discuss the differing views in document WAC/055 to assist the Commission in its upcoming consultations with the U.S. Department of State and NTIA in the development of U.S. positions for WRC-19.

---

<sup>1</sup> *5th WRC-19 Advisory Committee*, Public Notice, IB 16-185 (rel. April 26, 2018) (“Notice”).

**Document WAC/055 (23.04.18). WRC-19 Agenda Item 9.1, Issue 9.1.1: Sprint supports View A.**

Sprint supports No Change (NOC) as described in View A. IWG-2 members, tasked with studying WAC agenda items in the Terrestrial Service, were not able to reach consensus on a proposal for WRC-19 Agenda Item 9.1, Issue 9.1.1 regarding the possible technical and operational measures to ensure coexistence and compatibility between the terrestrial component of IMT and the satellite component of IMT in the frequency bands 1980–2010 MHz and 2170–2200 MHz. Sprint, the sole licensee of 1990-1995 MHz on a nationwide basis, and licensee of varied amounts of spectrum across the country on 1980-1990 MHz, is concerned that the proposals to introduce co-existence measures and constraints would have a preclusive impact on our existing 3G and 4G deployments in the Personal Communications Service (“PCS”) bands in the United States, as our operations would potentially be limited in almost all current deployment applications. Furthermore, the technical measures proposed to allow for coexistence would significantly limit the power of our base stations in the band to roughly the power Sprint’s mobile or hand-held devices use today. These proposed constraints on our base stations in the PCS band by a factor of 10,000 times the power they are allowed to operate at today would have a significant and negative impact on our future Network deployments, and would severely degrade our ability to effectively deploy service on Sprint’s nationwide spectrum assets which support millions of customers.

Sprint is also concerned about the impact these co-existence measures and constraints would have on ecosystem development in these PCS bands beyond the United States. If other administrations could not benefit from our developments in the United

States, this band is ultimately further precluded from efficient and economic operations as device and equipment manufacturers struggle to develop products with limited utility outside the United States.

In conclusion, Sprint, a current WAC member, believes that studies between the terrestrial and satellite components of IMT have found several technical and operational measures which can be implemented on a bilateral basis without the need for additional regulatory constraints on an international basis. Therefore, Sprint supports View A and believes that the draft proposal for WRC-19 provided in View A should be the basis for the United States Proposal to the Conference addressing WRC-19 Agenda Item 9.1, Issue 9.1.1, and that the United States should submit this draft proposal to the upcoming meeting of CITEL PCC.II for Agenda Item 9.1, Issue 9.1.1.

Respectfully submitted,

Sprint Corporation  
900 7<sup>th</sup> Street, NW – Suite 700  
Washington, DC 20001

Kyle B. Entz  
Kyle B. Entz  
*Manager, Spectrum*  
(703) 592-2968

Dated: May 10, 2018

CC: Michael Mullinix, [Michael.Mullinix@fcc.gov](mailto:Michael.Mullinix@fcc.gov)